

# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In Re Flint Water Cases*

No. 5:16-cv-10444  
Hon. Judith E. Levy  
Mag. Elizabeth A. Stafford

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*Walters v. City of Flint, et al.*

No. 5:17-cv-10164  
Hon. Judith E. Levy  
Mag. Elizabeth A. Stafford

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**AFFIDAVIT OF KELLY CUTLER**

Kelly Cutler, being duly sworn, deposes and says under penalty of perjury:

1. I am a lecturer of integrated marketing communications at Northwestern University Medill School of Journalism, with a focus on digital media and integrated marketing communications.

2. I am also the founder and CEO of a digital strategy firm.

3. I have more than twenty (20) years of experience in digital marketing.

4. Prior to founding my own company, I co-founded and led a Chicago-based search engine marketing firm for eleven (11) years.

5. I began my career working for Classified Ventures, Cars.com and AOL.

6. Over two decades, I have provided digital marketing and innovative solutions for companies including Johns Hopkins, North Shore University Health System, Hub international, the Los Angeles Film Festival, Hello World and Ryland Homes.

7. I teach courses to students focused on researching, developing, understanding, managing, overseeing, and measuring cutting-edge digital marketing strategies and tactics.

8. Through my courses, students explore various case studies and experience the invaluable knowledge of prominent guest speakers in the expansive digital professional community, encompassing agency, client, AdTech and measurement.

9. I am intimately aware of and have an expertise in digital marketing, including the use of Google Ads as well as different targeting tactics such as geotargeting, demographic targeting, and Dynamic Search Ads, which provide advertisers with different tactics for reaching targeted audiences.

10. I have been asked to provide a statement regarding the capability to reach targeted audiences with advertisements through Google Ads.

11. “Geo-Targeting” is a term used to describe the targeting of locations for advertisements. To that end, there are different ways in which individuals in a specific region or location can be targeted using Google Ads:

- a. Google Ads Location Targeting allows ads to appear in geographic locations chosen by the customer, specifically: countries; areas within a country; a radius around a location or region; and can also exclude locations based on countries, cities, regions etc.

b. Google Dynamic Search Ads are a way to find “customers” who are searching on Google using keywords, phrases, questions, and combinations.

12. Dynamic Search Ads are used by companies and advertisers to drive qualified traffic to a website or mobile app.

13. Dynamic Search Ads use a website’s content, among other factors, to target ads to individuals searching for specific information.

14. Dynamic Search Ad headlines and landing pages can be generated using content from a website, which keeps ads relevant.

15. To utilize Dynamic Search Ads most effectively, a company should include relevant and up-to-date content as well as titles, descriptions, images and URL’s to be included in search results. The more content that is added and the more specific the content is, the more effective Google’s Dynamic Search Ads will be.

16. While Google Ads location targeting specifically permits choices for zip codes, longitude and latitude, region, gender and age, Google’s Dynamic Search Ads can create targeting based on content.

17. As an example of the different methods to achieve the same result, consider the following hypothetical scenario:

a. A political candidate for office in Michigan’s 12<sup>th</sup> District who supports a woman’s right to choose could utilize Google Ads Location Targeting by selecting specific keywords or phrases, like

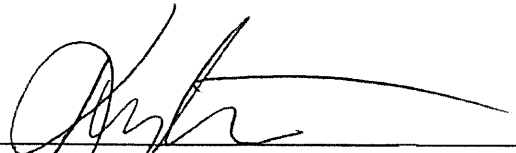
“abortion, “abortion rights,” and “Roe v. Wade,” as well as specific zip codes and demographics, to reach a desired/large constituency, such that the candidate’s “ads” or position on the issue can display for all females between the ages of eighteen (18) and twenty-five (25), in the zip-code 48107, who might search for those terms;

- b. The same political candidate could take advantage of her well-established website, in concert with Google’s Dynamic Search Ads, and continuously create very specific and relevant content for the website during her campaign, such that users who are searching for very specific information may have the candidate’s “ads” or position on the issue display in the search results.

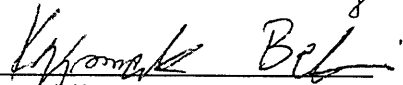
18. The more specific and relevant the content added to the website, the more effective the use of Google’s Dynamic Search Ads will be in reaching a targeted audience.

19. To that end, whereas the easiest way to determine the specific target audience for a business utilizing Google Ads Location Targeting is to review the selected keywords chosen, and chosen targeting criteria like locations, zip codes and demographics, an opportunity to determine the specific target audience for a business utilizing Google Dynamic Search Ads is to examine the content that has been added to the subject website, looking for relevance, timeliness and specificity.

20. It is my opinion that targeting individuals or populations can be accomplished using Google Dynamic Search Ads. This is not controversial or disputed within my industry.

  
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Kelly Cutler

Sworn to before me  
this 9<sup>th</sup> day of January, 2023.

  
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Notary Public

